

FINDING OF NO SIGNIFICANT IMPACT TENNESSEE VALLEY AUTHORITY CHATTANOOGA OFFICE SPACE ALTERNATIVES

Proposed Action and Need

The Tennessee Valley Authority (TVA) is seeking to lease or purchase approximately 600,000 square feet of office space in the Chattanooga, Tennessee, area beginning in January 2011. Due to the impending expiration of leases on office space currently occupied by TVA in Chattanooga, securing cost-effective replacement office space is essential for continuing business operations. The needed office space must be either contiguous or a campus-type development with individual buildings in close proximity. The potential impacts associated with this proposal are described in a final environmental assessment (EA) dated April 2007, which is incorporated by reference.

Alternatives

TVA must decide whether to renew the lease on its currently occupied office space in Chattanooga. If it decides not to renew the lease, it must then decide how to acquire suitable replacement office space. Alternatives identified for acquiring needed office space include Alternative 1 - Renewing the lease on the currently occupied office space; Alternative 2 - Leasing other appropriate existing office space in the Chattanooga area; Alternative 3 - Contracting for the construction of new office space on TVA property on the Chickamauga Dam Reservation; and Alternative 4 - Contracting for the construction of new office space on non-TVA property in the Chattanooga area. At this time, TVA is giving consideration to all four alternatives since discussions with prospective respondents to the Request for Proposals (RFP) are ongoing, and the outcome of those discussions is expected to substantially affect TVA's final decision.

Impacts Assessment

Under Alternative 1 or Alternative 2, TVA would lease existing office space. These alternatives could involve some minor remodeling activities to meet sustainable design and energy-efficiency building objectives. The remodeling could affect buildings eligible for or listed on the National Register of Historic Places (NRHP), and TVA would consult with the Tennessee State Historic Preservation Officer (SHPO) as necessary. Other impacts from remodeling would be minor and mostly short-term. The relocation of TVA employees from buildings currently occupied to different existing office buildings outside of the downtown Chattanooga area could impact local transportation, specifically vehicular traffic, but this is unlikely to materially affect existing traffic-flow patterns. Wildlife, endangered and threatened species, wetlands, and floodplains would not be affected.

Alternative 3 would involve construction on TVA land currently used for forest management, wildlife management, visual management, and public recreation. A forested buffer would be maintained around much of the perimeter of the site and impacts to vegetation, wildlife, water quality, aquatic ecology and recreation would be minor. With the maintenance of the buffer and mitigation measures listed below, the changes to the visual quality of the site, as well as on the nearby historic Chickamauga Dam, would be insignificant. TVA has concluded that the effects on cultural resources would not be adverse and the Tennessee SHPO has concurred with this determination. Impacts on local transportation, sewer network, and water supply systems would

also be insignificant. No endangered or threatened species, wetlands or floodplains would be affected.

Alternative 4, construction of new office space on non-TVA property in the city of Chattanooga, would entail construction on sites ranging from a greenfield site comparable to the Alternative 3 site or a previously disturbed brownfield site. The environmental impacts of construction on a greenfield site could be comparable to those for Alternative 3. Construction of the office space on a brownfield site would most likely have negligible impacts on biological communities and no impacts on sensitive resources such as endangered and threatened species and wetlands. The EA analyzes the former U.S. Pipe and Foundry site in Chattanooga as a representative brownfield site. The redevelopment of this site would initially involve demolition of several buildings, driving of foundation pylons, and construction of an office complex. With adherence to the mitigation measures listed below, there would be little to no impacts on most natural resources including endangered and threatened species, wetlands, water quality, and floodplains. The office complex would be designed to minimize impacts to visual resources and could improve the local scenery. TVA would assess the potential impacts on historic and prehistoric cultural resources as required by Section 106 of the NHPA and appropriately mitigate any such impacts in consultation with the Tennessee SHPO. For the U.S. Pipe site, additional cultural resource investigations would likely include examination of soil strata including, but not limited to, soil cores, well monitoring cores, and limited backhoe trenching to determine the presence of archaeological resources beneath the site. Compliance with Section 106 of the NHPA would ensure no significant adverse impacts to cultural resources or historic structures. Should another build-to-suit site be selected under Alternative 4, TVA would prepare a supplement to this EA that addresses any issues not previously addressed.

Mitigation

Alternative 1: No additional commitments beyond fulfilling applicable mandates for energy efficiency, accessibility, safety, and security.

Alternative 2: Consultation with the Tennessee SHPO before remodeling a building eligible for inclusion or already listed on the NRHP and before remodeling a building in the vicinity of a building eligible for inclusion or already listed on the NRHP. Disposal or recycling of remodeling debris (if any) in an appropriate manner in accordance with TVA policy and all applicable requirements.

Alternative 3:

- **Visual Buffer/Vegetation** - Maintain existing vegetation on the steep slopes on the north side of the tract from the shoreline to the prominent peaks of the tract as shown in Figure 2-1 of the EA.
- **Lighting** - During construction all lights used (pole-mounted, equipment-mounted, or structure-mounted floodlights) would be fully shielded or would have internal low-glare optics, such that light would not be emitted from the fixture at angles above the horizontal plane. For construction, this could require temporarily retrofitting floodlights, and other fixtures with external visors and side shields. Shielded low pressure sodium lighting would be used during the construction and operational phases. Area lighting and parking lot light poles would be no taller than 40 feet, unless they were lighting objects taller than 40 feet. In such cases, pole heights would be minimized.
- **Structures** - All color schemes for building exteriors would be visually compatible with natural background colors and provide dark roofs on all structures.

- **Construction Storm Water Best Management Practices (BMPs)** - Construction storm water BMPs would be required to reduce potential sediment loadings to Chickamauga Reservoir.

Alternative 4:

- **Construction Storm Water BMPs** - Construction storm water BMPs would be required to reduce potential sediment loadings to nearby streams.
- **Compliance With Applicable Environmental Regulations and Permits:** TVA would require its contractors or a lessor in a build-to-suit arrangement to comply with all applicable environmental regulations and permitting/approval requirements to lessen the risk of significant environmental impacts.
- **If a Presently Unidentified Site Were Selected:** Additional site-specific environmental review would be conducted at that time to ensure consistency with applicable environmental laws and the EA.
- **If Former U.S. Pipe Site Were Selected:** TVA would review its impacts on historic and prehistoric cultural resources as required by Section 106 of the NHPA and appropriately mitigate any such impacts in consultation with the Tennessee SHPO. Additional cultural resources review for the former U.S. Pipe site would likely include examination of geotechnical information on the soil strata in the APE including, but not limited to, soil cores, well monitoring cores, and limited backhoe trenching to determine if any archaeological resources are present in the alluvial soils beneath the existing site.

Public and Intergovernmental Review

TVA has involved the public in this proposal on several occasions since August 2006, when it initially contacted potential lessors and contractors. TVA also issued press releases at that time and directly informed area public officials, the owners of the existing TVA Chattanooga Office Complex building, sublessees, and others of its considerations. TVA subsequently issued status updates in October 2006 and January 2007. TVA's proposal has been the subject of numerous articles and reports in Chattanooga area print and electronic media from August 2006 through the present.

After receiving bids from potential office space providers and determining the range of alternatives, TVA issued a draft EA for public and interagency review on March 6, 2007. TVA announced the availability of the draft EA in press releases, web site notices, and in meetings with public officials. Comments were requested by March 26, 2007. Relatively few comments on the draft EA were received, and none were received from government agencies. The EA contains TVA's responses to the comments.

Conclusion and Findings

The EA concludes that Alternatives 1 and 2 would have no effects on most natural resources and insignificant or no effects on other resources. With appropriate permits and mitigation measures, including preservation of the forested buffer, Alternative 3 would not significantly affect natural resources, cultural resources, visual resources, recreation, transportation, and water supply and sewer systems. Based on the analyses of representative sites in the EA, the selection of Alternative 4 is unlikely to result in significant impacts, and TVA would conduct any necessary site-specific investigations, carry out any necessary consultations, and incorporate appropriate mitigation measures to minimize the impacts of this alternative.

Based on the findings listed above and the analyses in the associated EA, we conclude that implementation of any of the four alternatives would not be a major federal action significantly

affecting the quality of the environment. Accordingly, an Environmental Impact Statement is not required. This Finding of No Significant Impact is contingent upon adherence to the identified mitigation measures.

Charles P. Nicholson for JML

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Jon M. Loney, Manager
NEPA Policy
Environmental Stewardship and Policy
Tennessee Valley Authority

Date Signed